



VIA ECF

April 27, 2022

Hon. Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Dupres et al. v. Houslanger & Assocs., PLLC et al.*, No. 19 Civ. 6691 (RPK) (SJB)

Dear Judge Bulsara:

We represent Plaintiffs and the putative class in this action. We write jointly on behalf of Plaintiffs and Defendants to update the Court on the status of this litigation, pursuant to the Court's Order of April 16, 2022.

The Parties are pleased to report that they have reached a settlement in principle and expect to be able to sign a stipulation of settlement shortly. Both parties are motivated to move as quickly as possible to settlement approval. To that end, Plaintiffs will send Defendants a draft stipulation tomorrow, to which Defendants have committed to provide proposed revisions by Wednesday, May 4th. The Parties propose to sign a final stipulation within two weeks, by Wednesday, May 11th. Defendants will also provide Plaintiffs data, to be agreed upon by the Parties, that will allow Plaintiffs to develop an allocation plan. Defendants intend to provide that data by May 11th; Plaintiffs expect to submit a motion for preliminary settlement approval by one week thereafter, Wednesday, May 18th. The Parties will consent to Your Honor's jurisdiction for purposes of the settlement approval process, and will file their consent via ECF in the coming days.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Jessica Ranucci

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